

## PATRICK J. JOYCE, ESQ.

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January 17, 2012

Honorable Kiyo A. Matsumoto  
United States District Judge  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

Re: United State v. Gerardo Fusella,  
11 CR 844

Dear Judge Matsumoto,

I am writing on behalf of the defendant, Gerardo Fusella, in the above-referenced proceeding. Mr. Fusella was to have finalized his bail package by tomorrow however due to various reasons we will be unable to complete the bail package by tomorrow. Mr. Fusella was released on a \$1,000,000.00 bond signed by him and 3 co-signors and fully secured by property. As of this moment Mr. Fusella and 3 co-signors have executed the bond however we have yet to be unable to file confessions of judgments on properties with \$1,000,000.00 of equity. We are working quite diligently to finalize the bail package but unavoidable delays have arisen. Therefore, I respectfully request that the date for the bail package to be finalized be extended from tomorrow to January 25<sup>th</sup>. AUSA Whitman Knapp and I have been in constant communication over the issues involved herein and he understands the situation and has no objection to the one week adjournment. Mr. Fusella has also met all of his pre-trial requirements as of the time of this letter, he has been reporting as requested by Pre-Trial without any incidences. Based on the above the defendant respectfully requests the Court grant the extension to January 25, 2012.

Respectfully yours,

  
Patrick Joyce

cc: AUSA Whitman Knapp